

REPLY TO ADVISORY OFFICE ACTION DATED SEPTEMBER 7, 2005 AND FINAL OFFICE ACTION DATED MAY 2, 2005
SERIAL NO: 09/834,325 DOCKET NO: 199-0044US

REMARKS

Claims 1~15, and 24~33 are pending.

No claim is amended.

Claims 1~15, and 24~33 are still pending.

Response to Examiner's Arguments in the Advisory Office Action

The Applicants appreciate the Examiner taking time to provide substantive response to Applicants' reply filed on 8/2/2005 in the above cited Advisory Office Action.

Besides the arguments presented in the last reply dated 8/2/2005, which are also re-submitted below, Applicants would like to clarify their arguments and respond to Examiner's assertions:

Regarding "Arguing Against References Individually" (MPEP 2145 IV), Applicants submit that arguments in last reply were presented regarding *both* references individually and in their combination. Applicants submitted that one of the references, Smith, does not teach one of the elements ("a camera adaptor"), which was allegedly taught by Smith and not other references (Ludwig and Hildin). Therefore, the combination of the three references does not teach at least this missing element. Since the combination does not teach *all* claim limitations in the claimed invention (e.g. claim 1), the obvious rejection based on such combination is improper. MPEP 2143. Therefore, claim 1 is allowable.

Regarding "features upon which applicant relies (i.e., making a camera adapter be a part of the main unit) are not recited in the rejected claim(s)," the Applicants submit that such feature *is* recited in the rejected claims. More specifically, for example, claim 1 recites:

A video conferencing system *comprising* a main unit, *the main unit including* a device interface, *a camera adapter*, a docking station adapter, a processor, and a memory, *the device interface including* one or more ports, each of the one or more ports adapted to provide an output to a device or receive an input from a device; *the processor and the memory configured* to perform video conferencing functions; *the camera adapter configured* to removably receive a camera unit that provides audio and video signals to the main unit through the camera adapter, the processor of the main unit programmed to process the audio signals and, in response to the

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audio signals. to generate control signals to control at least one of the direction or zoom of the camera unit; and
the docking station adapter configured to removably couple to a docking station that connects the main unit in a communicating relationship with a video conferencing network.

The “*camera adapter*” is recited in claim 1 to be “*included*” in the main unit, i.e. the “camera adapter” is a part of the “main unit.” All other claims have at least this claim limitation.

On the other hand, the “hinged connector (33, figure 6),” which is clearly taught in Smith, is “outside” a portable computer. As discussed in the argument below, and according to cited teaching from Smith, the “hinged connector” cannot be a “camera adapter” of claim 1, which is required to be included in a “main unit” of claim 1.

The following are arguments filed in the last reply. Applicants respectfully request that the Examiner reconsider these arguments in view of the above clarification.

Rejections under 35 U.S.C. § 103

Claims 1–3, 5–11, 15, 24–25

The Examiner rejected claims 1–3, 5–11, 15 and 24–25 under § 103(a) as obvious over U.S. Patent 5,617,539 to Ludwig (“Ludwig”), U.S. Patent 5,768,163 to Smith II (“Smith”) and U.S. Patent 5,844,599 to Hildin (“Hildin”). Claims 1 and 24 are independent claims; other claims depend, either directly or indirectly, from one of these two claims. Because independent claims 1 and 24 are allowable over the cited art, it is not necessary to address the rejections of the dependent claims. Therefore, the following remarks focus on independent claims 1 and 24.

In response to Applicants’ argument filed on 11/23/2004, regarding the three references: Ludwig, Smith and Hildin, Examiner reasserted that there was teaching or suggestion for their combination. Applicants disagree.

Specifically, aside from the argument presented on 11/23/2004, Applicants would like to draw Examiner’s attention to the teaching of Smith. Examiner asserted that “Smith teaches a portable computer including a camera adapter to receive a camera unit in order to expand the versatility of the portable computer (col. 3 line 31 through col. 4 line 32).” Applicants submit that this characterization of the teaching of Smith is not entirely correct. Smith does teach a camera adapter, or more precisely a “*versatile attachment* of a handheld device” to a host computer system, but the “*versatile attachment*” is not part of the host computer system (e.g. a

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laptop computer, which Examiner asserted to be equivalent to the main unit of claim 1).

The “versatile attachment” of Smith can be attached to the host or *detached*. It is not considered a part of the host computer (e.g. laptop computer). For example, Col. 1, lines 57-58 “... by placing a hinged connector on an *outside* of a case of the host computer.” To make the “versatile attachment” versatile and expand the versatility of a portable computer, the “versatile attachment” is attachable and *detachable* from the host. For example, Col. 3, lines 32-33: “Media clip pad 11 can be attached to *or detached* from portable computer 10 and/or a desktop computer 14.” If the “versatile attachment” were made un-detachable part of the host laptop computer (i.e. becoming a part of the host computer), then much of the versatility is lost. See MPEP 2143.01 “the proposed modification cannot change the principle of operation of a reference.” From the general teaching of Smith, and the cited sentences above in particular, Smith teaches that the versatile attachment is not and should not be part of the host computer. Smith teaches away from making a camera adapter (versatile attachment) be a part of the main unit (laptop computer), which is required by the invention of claim 1, “... the main unit including ... a camera adapter,” See MPEP 2141.02 “prior art must be considered in its entirety, including disclosures that teach away from the claims.” Therefore, Smith cannot be properly combined with Ludwig.

Furthermore, Smith teaches that the handheld device can be a digital camera, e.g. Figure 7, 8 and 17, Col. 4 line 50 – Col. 5, line 11. These teaching show that the handheld camera is a simple camera to take snap shot or video clips. There is no teaching or suggestion that such a handheld device is capable to “generate control signals to control at least one of the direction or zoom of the camera unit.”

Hilden disclosed a sophisticated “voice following video system,” which includes a position control system 106 (Fig. 1) and voice-activated emitter 104, and may be able to “generate control signals to control at least one of the direction or zoom of the camera unit,” but there is no teaching or suggestion that such a system can be implemented into a handheld digital camera by modifying the teaching in Smith. Even if “one skill in the art would recognizes to modify the laptop computer with the features as taught by Smith and Hilden in order to expand the versatility of the portable computer and to make user friendly,” which Applicants do not concede, there is no teaching or suggestion that such a modification of Smith (a handheld digital camera) by Hilden (voice following video system) can have a “reasonable expectation of

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success." Aside from a bare assertion, Examiner cited no support from any references. See MPEP 2143. Therefore, Smith cannot be properly combined with Hilden.

For the above reasons, the combination of Ludwig and Smith, and the combination of Smith and Hilden are not proper. Therefore, the combination of Ludwig, Smith and Hilden is not proper and the rejection based on their combination is improper. Claim 1 is allowable and its allowance is requested.

Independent claim 24 has at least the same limitations regarding the "main unit," so it is allowable for the same reasons. All other dependent claims 2-15 and 25 depend directly or indirectly from independent claims 1 and 24, therefore they are all allowable and their allowance is requested.

Claims 4 and 12-14

Claims 4 and 12-14 were rejected further in view of Robinson. Since they are dependent claims from claim 1, they are allowable at least for the reason given above.

Claims 26-33

Independent claim 26 was rejected in view of the combination of Ludwig and Smith. For the reason discussed above, the combination of Ludwig and Smith is improper. So the rejection is improper. Claim 26 is allowable and its allowance is requested. Dependent claims 27-33 depend from claim 26 directly or indirectly, so they are all allowable and their allowance is requested.

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CONCLUSION

Reconsideration of the pending claims in light of the above remarks and allowance of all pending claims are respectfully requested. If, after considering this reply, the Examiner believes that a telephone conference would be beneficial towards advancing this case to allowance, the Examiner is invited to contact the undersigned attorney at the number listed.

9/16/2005

Liangang Remark

Date

Liangang (Mark) Ye
Reg. No. 48,276
Email: mye@counselIP.com
Wong, Cabello, Lutsch, Rutherford & Brucculeri, L.L.P.
20333 SH 249, Suite 600
Houston, Texas 77070
Voice: 832-446-2407
Facsimile: 832-446-2424